

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

HELBACHS CAFE LLC
DBA: HELBACHS CAFÉ ROASTERS &
KITCHEN

Plaintiff,

CASE NO. 3:20-CV-00758

v.

CITY OF MADISON,
COUNTY OF DANE,
JANEL HEINRICH,
MARCI PAULSEN, and
BONNIE KOENIG,
All individuals in their official capacity,

Defendants.

DEFENDANTS' EXPERT WITNESS DISCLOSURES

The City of Madison, County of Dane, Janel Heinrich, Marci Paulsen, and Bonnie Koenig, by their attorneys, MUNICIPAL LAW & LITIGATION GROUP, S.C., hereby submit the following expert witness disclosures pursuant to the Federal Rule of Civil Procedure 26(a)(2)(A).

1. Expert Witnesses pursuant to Rule 26(a)(2)(B)

A. **Lisa Cribben**, whose qualifications are attached hereto, may be called to provide testimony at trial under Fed. R. Civ. P. 702, 703, or 705 to the Federal Rules of Evidence. Attached is a written report prepared and signed by Ms. Cribben with, among other information, her opinions, testimonial experience, and compensation for services.

The City of Madison, County of Dane, Janel Heinrich, Marci Paulsen, and Bonnie Koenig, reserve the right to supplement their expert and witness disclosures as information becomes known during the course of discovery or to offer rebuttal testimony. This Witness List is preliminary based on what has been discovered to date and said defendants reserve the right to amend the list of witnesses as further names become known during the course of discovery including any person whose deposition is taken prior to trial. Defendants reserve the right to call any expert witnesses disclosed by parties to this action. Actual determination of which of the above witnesses will be called will be based upon what, if any, facts are stipulated to, additional and continuing discovery in this case, and any other developments in the course of trial.

Dated this 14th day of April, 2021.

**MUNICIPAL LAW & LITIGATION
GROUP, S.C.**

Attorneys for City of Madison, County of Dane, Janel Heinrich, Marci Paulsen, and Bonnie Koenig.

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